

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re : Mary Schaepe,	:
Debtor	:
	: Chapter 13
	:
In re: Mary Schaepe,	:
Plaintiff	: Bk Case 5:07-bk-51803- RNO
	: Adversary Case 5:09-ap-00168-RNO
	:
vs.	:
	:
Cavalry Portfolio Services,	:
PO Box 1017	: Jury Trial Demanded
Hawthorne, NY 10532	:
	:
Cavalry Portfolio Services	:
PO Box 277288	:
Tempe, AZ 85285-7288	:
Defendant	:

Motion To Approve Settlement

1. The Parties captioned above having reached an agreement to discontinue and settle the above captioned adversary proceeding, they now seek approval of the Court per F.R.B.P. 9019.
2. The Parties believe the Settlement to be a fair way of disposing of damages to Plaintiff /Debtor, and an assistance with any attorney fees not to the disadvantage of any creditor.
3. The Parties believe the Court itself to benefit from improvement to the Judicial economy.
4. Upon Notice of the Creditors, the Parties seek approval of the Settlement filed upon the docket.

Respectfully submitted,

/s/ John Piazza, III
John Piazza, III, Esquire
Attorney for Petitioner
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Date: 3 December 2009